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NOV 29 1984

DEPARTMENT OF ENVIRONMENTAL PROTECTION
STATE OF ILLINOIS

REVERE

COPPER AND BRASS INCORPORATED

November 29, 1984



P.O. Box 250
CLINTON, ILL. 61727
217-935-3111
TWX: 510-527-7750

Mr. Glenn D. Savage, Jr.
LFOS - DLPC
Illinois EPA
4500 S. Sixth Street
Springfield
IL 62706

EPA Region 5 Records Ctr.



315346

Ref: LPC #03900504 - DeWitt County
Clinton/Revere Copper and Brass
ILD #005078274
COMPLIANCE INQUIRY LETTER

Dear Mr. Savage,

In response to your letter dated November 13, 1984, referenced as above, Revere has the following comments:

1. The inspection log that was discontinued in March of 1984 has been reestablished and is updated weekly.
2. Our facility contingency plan has been updated to include all the requirements of 35 Il. A.C. 725.116 and has been distributed to the Alternate Coordinator, the Utensil Plant Manager, the Industrial Products Plant Superintendent and the appropriate local authorities.
3. This facility has withdrawn our application for Interim Status based upon a review of our activities that disclosed that Interim Status was not required. Since we do not require Interim Status, those requirements described as alleged violations of 35 Il. A.C. 725.114(c), 725.242(b), 725.211-215 and 725.243 are inapplicable. Our position in this regard is based upon the advice of our legal counsel. Should you wish to discuss this further, please contact: *closure plan*

Mr. S. H. Kaprelian
Assistant Secretary and Associate Counsel
Revere Copper and Brass Incorporated
605 Third Avenue
New York, NY 10158
(212) 578-1526

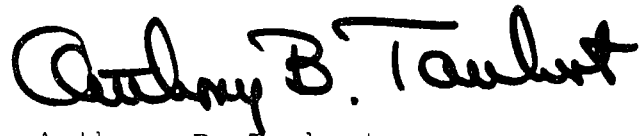
4. As a practical matter, the storage of our clay-like F006 wastewater treatment plant sludge in open containers does not present any risk to the environment. Revere

(cont'd)

SUBJECT: COMPLIANCE INQUIRY LETTER RESPONSE
page 2

suggests that there is little likelihood that this heavy, solid filter-cake material would ever escape from the in-plant storage area and would ask the Agency to waive the closed container requirement for this material.

Sincerely,

A handwritten signature in black ink, reading "Anthony B. Taubert". The signature is written in a cursive style with a large, prominent "A" and "T".

Anthony B. Taubert
Chief Chemist

cc: S. H. Kaprelian
M. A. Bingaman
R. T. Cunningham
file